

**From:** Anthony Kirkwood  
**To:** Kjell Johansen  
**Date:** 7/24/03 8:45AM  
**Subject:** Response: 10CFR30.18 Exempt Quantities Question

Mr. Johnson,

You asked if the exemption granted under 30.18, for "...individual byproduct material in individual quantities each of which does not exceed the applicable quantity set forth in 30.71, Schedule B," means separate sources, say a single Cs-137 or a single Co-60 source, not a mixture of the two even though each may not exceed the exempt quantity.

You are correct in that each source is considered separately for purposes of the regulation. This is further clarified in 10 CFR 32.18(c) which indicates that the sources are not to be incorporated into any manufactured product. This changes only for purposes of transfer wherein 10 CFR 32.19(a) indicates that no more than 10 exempt quantities may be transferred in any single transaction. However, individual exempt quantities may be composed of fractional parts provided the sum total ratios do not exceed unity, though the number of individual exempt quantities may have exceeded 10.

Hope this helps you. If you have any further questions on this please contact myself as below or Bruce Carrico at 301-415-7826 or Email: [www.jbc@nrc.gov](mailto:www.jbc@nrc.gov).

P.S. By the way 10 CFR 20.303 referred to sanitary sewer releases.

Sincerely,

Anthony S. Kirkwood, Health Physicist  
NRC/NMSS/IMNS/MSIB-A  
MS: T8F5, RM: T8J10  
(301) 415-6140 (Voice), (301) 415-5369 (Fax)  
E-mail: [ask@nrc.gov](mailto:ask@nrc.gov)

>>> Kjell Johansen <[kjell.johansen@nmcco.com](mailto:kjell.johansen@nmcco.com)> 07/23/03 02:25PM >>>  
Below is the result of your feedback form. It was submitted by

Kjell Johansen ([kjell.johansen@nmcco.com](mailto:kjell.johansen@nmcco.com)) on Wednesday, July 23, 2003 at 14:25:59

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comments: The exemption granted under 30.18 is for "...individual byproduct material in individual quantities each of which does not exceed the applicable quantity set forth in 30.71, Shedule B." The way I read this is that "individual quantities each of which" means separate sources, say a single Cs-137 or a single Co-60 source, not a mixture of the two even though each may not exceed the exempt quantity. Am I correct? Or, does the summation of fractions as used in 10CFR20 Appendix B for effluent concentrations or the summation of fractions mentioned in the note to Appendix B to Part 30 ( which probably applies to labeling requirements but is impossible to tell because you refer to the old 20.303 which I tossed long

ago and is not available electronically on your website) apply to the exemption determination mentioned in 30.18?

organization: Point Beach Nuclear Plant

address1: 6610 Nuclear Rd

address2:

city: Two Rivers

state: WI

zip: 54241

country: USA

phone: 920-755-6869

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**CC:** Deirdre Spaulding; J. Bruce Carrico; Marissa Bailey; Scott Burnell

**Mail Envelope Properties**

(3F1FD503.52A : 18 : 21230)

**Subject:** Response: 10CFR30.18 Exempt Quantities Question

**Creation Date:** 7/24/03 8:45AM

**From:** Anthony Kirkwood

**Created By:** ASK@nrc.gov

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SRB3 CC (Scott Burnell)	Opened	07/24/03 08:50AM
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RKS BC (Richard Struckmeyer)

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